#### IN THE UNITED STATES DISTRICT COURT

#### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED:	
V.	:	CRIMINAL NO.:	

DAVID LLOYD SHORE : VIOLATIONS:

: 18 U.S.C. § 2113(d) (armed bank robbery -

2 counts)

: 18 U.S.C. § 924(c)(1) (use and carrying of a firearm during and in relation to crime of

: violence - 2 counts)

18 U.S.C. § 922(g)(1) (convicted felon in

: possession of firearm - 1 count)

**Notice of forfeiture**)

#### INDICTMENT

### **COUNT ONE**

#### THE GRAND JURY CHARGES THAT:

On or about October 7, 2006, in Lancaster, in the Eastern District of Pennsylvania, defendant

#### DAVID LLOYD SHORE

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the M&T Bank, 1847 Columbia Avenue, Lancaster, lawful currency of the United States, that is, approximately \$3,290, belonging to, and in the care, custody, control, management and possession of the M&T Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant **SHORE** knowingly and unlawfully assaulted

and put in jeopardy the lives of the employees of M&T Bank, and other persons, by use of a dangerous weapon, that is, a handgun.

In violation of Title 18, United States Code, Section 2113(d).

### **COUNT TWO**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2006, in Lancaster, in the Eastern District of Pennsylvania, defendant

# **DAVID LLOYD WRIGHT**

knowingly used and carried a firearm, that is, a .380 Highpoint firearm, with an obliterated serial number, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery in violation of Title 18, United States Code, Section 2113(d), as charged in Count One of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

### **COUNT THREE**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about October 17, 2006, in Concordville, in the Eastern District of Pennsylvania, defendant

### DAVID LLOYD SHORE

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the M&T Bank, Route 1 and Cheney Road, Concordville, lawful currency of the United States, that is, approximately \$3,241, belonging to, and in the care, custody, control, management and possession of the M&T Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant **SHORE** knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of M&T Bank, and other persons, by use of a dangerous weapon, that is, a handgun.

In violation of Title 18, United States Code, Section 2113(d).

### **COUNT FOUR**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about October 17, 2006, in Concordville, in the Eastern District of Pennsylvania, defendant

# **DAVID LLOYD WRIGHT**

knowingly used and carried a firearm, that is, a .380 Highpoint firearm, with an obliterated serial number, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery in violation of Title 18, United States Code, Section 2113(d), as charged in Count Three of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

# **COUNT FIVE**

# THE GRAND JURY CHARGES THAT:

From on or about October 7, 2006, to on or about October 17, 2006, in the Eastern District of Pennsylvania, defendant

# DAVID LLOYD SHORE,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a .380 Highpoint, with an obliterated serial number.

In violation of Title 18, United States Code, Section 922(g)(1).

### **NOTICE OF FORFEITURE**

# THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c)(1) set forth in this indictment, defendant

# **DAVID LLOYD SHORE**

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of such offenses including, but not limited to a .380 Highpoint firearm, with an obliterated serial number and ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:
FOREPERSON

PATRICK L. MEEHAN United States Attorney